U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 2

April 29, 2019

BY ELECTRONIC MAIL

Robert Law, Ph.D.
de maximis, inc.
186 Center Street, Suite 290
Clinton, New Jersey 08809

Re: Revised High Volume Chemical Water Column Monitoring Sampling Program Characterization Summary Report

Dear Dr. Law:

The U.S. Environmental Protection Agency (EPA) has reviewed the *revised High Volume Chemical Water Column Monitoring Sampling Program Characterization Summary Report*, dated November 2014 and the responses to EPA's comments. The report was prepared by AECOM on behalf of the Cooperating Parties Group (CPG) for the Lower Passaic River Study Area. EPA evaluated the report and the responses to EPA's comments and submitted additional comments on February 26, 2019.

EPA reviewed the responses to comments and the revised report submitted by the CPG in March 2019. All comments were addressed with the exception of minor additions to comments numbered 18 (4a) and 25. EPA conditionally approves the report as long as comment 18 (4a) and 25 are addressed. Please finalize the report in accordance with Section X, Paragraph 44(a) of the Agreement. If there are any questions or clarifications needed, please contact me to discuss.

Sincerely,

Diane Salkie, Remedial Project Manager
Lower Passaic River Study Area RI/FS

Cc: Zizila, F. (EPA)
Sivak, M. (EPA)
Hyatt, B. (CPG)
Potter, W. (CPG)

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Small Volume Chemical Water Column Monitoring Sampling Program Characterization Summary for the Lower Passaic River Study Area Dated February 2014 Response to 6/18/14 EPA Comments

No.	Section	EPA Comment 6/14/2014	Response to Comment 11/25/2014	EPA Comment Review 2/26/2019	Response to Comment 3/18/2019	EPA Response
18	Page 3-1, Section 3.0	a. Please include a discussion on the results of the dynamic spike and static spike, including an evaluation of whether the PUF media performed as expected. b. Please include a table with the percentage of total dissolved contaminant mass detected in the first PUF and second PUF. Please discuss whether analysis of the second PUF detected target compounds, and whether two PUFs would continue to be needed in future sampling events. c. Please expand the discussion of the results of the post-PUF filtrate analysis. The brief discussion in Section 4.3.2 does not provide enough information.	a. A section will be added to the Report that discusses the results of the static and dynamic spikes as well as the performance of the PUF. b. A table will be added providing the percentages of dissolved mass detected on first and second PUFs. Based on the results of this analysis, the revised Report will include a statement regarding the necessity and use of the second PUF. c. The results of the post- PUF filtrate samples will be expanded.	4) Tables 3-4 and 3-5 a. Add a note to identify where the PUF sample labels were inadvertently switched.	4a) A note has been added to Table 3-4 and Table 3-5 to document which PUF were switched. This has also been done to Tables 3-6 and 3-7.	4a) Response accepted; the change has been verified. Note: there is an entry in cell I-234 of Table 3-7 that appears to be unassociated with the table. Please confirm and remove or explain the entry in the final report.
25	Page 3-3, Section 3.3.4 and Table 3-3	The HV CWCM Report shows that the HV samples provided lower detection limits and fewer non- detect results compared to the SV samples. Please provide a comparison of the 2,3,7,8 TCDD and Total PCB concentrations in HV samples relative to the non-detect SV samples.	The range of non-detects from SV CWCM will be provided and compared graphically to the concentrations of 2,3,7,8-TCDD and Total PCBs.	Further action required. New Attachment F presents SV detection limits versus HV detection limits. However, total PCBs data are not presented, only selected PCB congeners.	Summarizing detection limits for the total PCBs calculated values is not meaningful. The sum represents only detected PCBs and non-detects are treated as zeros. Only individual PCB congeners can provide meaningful detection limit information. The individual PCB congeners were selected based on their potential significance to risk and low frequencies of detection. No edit to report is necessary.	"Table 3-1 Range of Detection Limits Achieved in HV CWCM Program" is missing from the report. Please include the referenced table in the final report.